IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF OKLAHOMA

Quinda Beeson,)	
Plaintiff,)	
v.)	Case No. CIV-20-327-SLP
Safeco Insurance Company of America,)	
Defendant.)	

PLAINTIFF'S UNOPPOSED MOTION TO PLACE CERTAIN COURT FILINGS UNDER SEAL

COMES NOW Plaintiff Quinda Beeson and moves the Court for an immediate order placing Exhibit 7 to *Plaintiff's Motion to Exclude Testimony of Andrew Jayne*, filed January 21, 2022, Doc. 79 ("Plaintiff's Motion") and Exhibit 4 to *Plaintiff's Response and Objections to Defendant Safeco Insurance Company of America's Motion for Summary Judgment*, filed January 24, 2022, Doc. 84 ("Plaintiff's Response") under seal. In support of this Motion, Plaintiff states as follows:

Plaintiff's Motion was filed on January 21, 2022. [Doc. 79]. Filed with Plaintiff's Motion were seven (7) exhibits. Three of the seven exhibits, exhibits 4, 5, and 6, were filed under seal. Additionally, Plaintiff's Response [Doc. 86] filed on January 24, 2022 contained six (6) exhibits. Two of the six exhibits, exhibits 2 and 3, were filed under seal. Plaintiff inadvertently filed transcript pages from the deposition of Barbara Meyer (Exhibit 7 to the Motion and Exhibit 4 to the Response), for public to view. Said transcript pages were previously designated as confidential by defense counsel on March 9, 2021 in

accordance with the parties Agreed Protective Order filed by the Court on June 26, 2020, [Doc. 15].

Plaintiff's counsel has conferred with defense counsel and they have no objection to the filing of this Motion.

Pursuant to the parties Agreed Protective Order, Plaintiff asks the court to enter an immediate Order placing Exhibit 7 to *Plaintiff's Motion to Exclude Testimony of Andrew Jayne* [Doc. 79] and Exhibit 4 to *Plaintiff's Response and Objections to Defendant Safeco Insurance Company of America's Motion for Summary Judgment* [Doc. 84] under seal.

Respectfully submitted,

/s/Jacob L. Rowe

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ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that on this 27th day of January, 2022, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing. Based on the records currently on file, the Clerk of Court will transmit a Notice of Electronic Filing to the following ECF registrants:

William W. O'Connor Margo E. Shipley 320 S. Boston Ave., Suite 200 Tulsa, OK 74103 boconnor@hallestill.com mshipley@hallestill.com

/s/Jacob L. Rowe